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*Lead Counsel to Lead Plaintiff and the Class*

## *Bankruptcy Counsel to Lead Plaintiff and the Class*

**MICHELSON LAW GROUP**  
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## *Bankruptcy Counsel to Lead Plaintiff and the Class*

*(additional counsel on Exhibit A)*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

## Debtors.

Case No. 19-30088 (DM) (Lead Case)  
Chapter 11  
(Jointly Administered)

Affects Both Debtors

Affects PG&E Corporation

Affects Pacific Gas and Electric Company

**AMENDED SECURITIES LEAD  
PLAINTIFF'S EXHIBIT LIST FOR  
CONFIRMATION HEARING**

1 Public Employees Retirement Association of New Mexico (“**Lead Plaintiff**”), the court-  
2 appointed lead plaintiff in the securities class action captioned as *In re PG&E Corporation*  
3 *Securities Litigation*, Case No. 18-03509 (the “**Securities Litigation**”) pending in the United  
4 States District Court for the Northern District of California (the “**District Court**”), on behalf of  
5 itself and the class that it seeks to represent in the Securities Litigation (the “**Class**”),<sup>1</sup> together  
6 with York County on behalf of the County of York Retirement Fund, City of Warren Police and  
7 Retirement System, and Mid-Jersey Trucking Industry & Local No. 701 Pension Fund  
8 (collectively with Lead Plaintiff the “**Securities Plaintiffs**”) hereby submit this Amended  
9 Exhibit List (the “**Exhibit List**”) for the hearing to begin on May 27, 2020 at 10:00 am  
10 (prevailing Pacific Time) (the “**Confirmation Hearing**”) regarding confirmation of the *Debtors’*  
11 *and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated March 16, 2020*  
12 [ECF No. 6320] (the “**Plan**”) of the debtors in possession (the “**Debtors**”) in the above-  
13 captioned chapter 11 bankruptcy cases (the “**Chapter 11 Cases**”), in support of Securities  
14 Plaintiffs’ objection to confirmation of the Plan (the “**Objection**”):

## EXHIBITS

No.	Description
SP-001	Lead Plaintiff's First Set of Document Demands to the Debtors in Connection with Confirmation of the Plan
SP-002	Email from Richard Slack to Randy Michelson, dated 5/14/2020 10:09 PM, re: Document Requests

1 On February 27, 2019, the Court entered an order denying Securities Plaintiffs' motion to  
2 apply Bankruptcy Rule 7023 to the claims Lead Plaintiff filed on behalf of the Class.  
3 Securities Plaintiffs timely appealed from that order and their appeal remains pending in the  
4 District Court. Nevertheless, the issues raised in this Objection apply equally to Securities  
5 Plaintiffs individually, who also timely filed individual proofs of claim in these Chapter 11  
6 Cases and to the members of the Class. In addition, as the court-appointed lead plaintiff in  
7 the Securities Litigation, Lead Plaintiff remains a fiduciary for Class members. *See, e.g.,*  
8 *Eubank v. Pella Corp.*, 753 F.3d 718, 723-24 (7th Cir. 2014) ("Class representatives are . . .  
9 fiduciaries of the class members. . . ."); *Schick v. Berg*, 2004 WL 856298, \*4 (S.D.N.Y. Apr.  
10 20, 2004) ("The general rule is that the named plaintiff and counsel bringing the action stand  
11 as fiduciaries for the entire class, commencing with the filing of a class complaint."); *cf. In re*  
12 *Gen. Motors Corp. Pick-Up Truck Fuel Tank Prod. Liab. Litig.*, 55 F.3d 768, 801 (3d Cir.  
13 1995) ("Beyond their ethical obligations to their clients, class attorneys, purporting to  
14 represent a class, also owe the entire class a fiduciary duty once the class complaint is  
15 filed."))

1	SP-003	Email from Randy Michelson to Richard Slack, dated 5/18/2020 2:25 PM, re: Document Requests
2	SP-004	<i>Memorandum in Opposition to Officer Defendants' Motion to Dismiss Third Amended Consolidated Class Action Complaint</i> , Case No. 5:18-cv-03509-EJD, Docket No. 160, including Appendix A, Docket No. 160-1
3	SP-005	<i>Plaintiffs' Opposition to the Defendant Directors and Underwriters' Motion to Dismiss Third Amended Complaint and the Officer Defendants' Joinder of Said Motion</i> , Case No. 5:18-cv-03509-EJD, Docket No. 161
4	SP-006	<i>Plaintiff's (1) Opposition to Officer Defendants' Request for Judicial Notice and (2) Cross-Request for Judicial Notice</i> , Case No. 5:18-cv-03509-EJD, Docket No. 162
5	SP-007	<i>Declaration of Louis Gottlieb in Support of Plaintiff's (1) Opposition to Officer Defendants' Request for Judicial Notice and (2) Cross-Request for Judicial Notice</i> (with attached Exhibits), Case No. 5:18-cv-03509-EJD, Docket No. 164
6	SP-008	The daily opening and closing prices of PG&E Corp. common stock (PCG) on the Petition Date, January 29, 2019
7	SP-009	Report listing the trading volume of the Debtors' stock between November 15, 2018 and the July 1, 2019 Record Date, retrieved from <a href="https://finance.yahoo.com/quote/PCG/key-statistics?p=PCG">https://finance.yahoo.com/quote/PCG/key-statistics?p=PCG</a> and attached as Exhibit 1 to <i>Declaration of Andrew D. Behlmann, Esq. in Support of Securities Lead Plaintiff's Reply in Further Support of Motion to Apply Bankruptcy Rule 7023 to Class Proof of Claim</i> , ECF No. 5458-1
8	SP-010	<i>Notice of Extended Deadline for Filing Certain Securities Claims for Rescission or Damages</i> , ECF No. 5943-2

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18 **DESIGNATION OF SPEAKING ATTORNEYS AT CONFIRMATION HEARING**

19 In accordance with the *Order Establishing Confirmation Hearing Protocol* [ECF No.

20 7182], Lead Plaintiff and the Securities Plaintiffs have previously provided notice via email the

21 following parties may appear, speak on behalf of, and cross-examine witnesses on behalf of Lead

22 Plaintiff and the Securities Plaintiffs at the Confirmation Hearing: Michael S. Etkin

23 (metkin@lowenstein.com) and Andrew D. Behlmann (abehlmann@lowenstein.com) of

24 Lowenstein Sandler, LLC, Thomas Dubbs (tdubbs@labaton.com) and Jeffrey Dubbin

25 (jdubbin@labaton.com) of Labaton Sucharow, and Randy Michelson

26 (randy.michelson@michelsonlawgroup.com) of Michelson Law Group.

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1                   **RESERVATION OF RIGHTS**  
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3                   The Securities Plaintiffs reserve the right to (a) amend or supplement the foregoing  
4                   Exhibit List at any time prior to the Confirmation Hearing; (b) use additional exhibits for  
5                   purposes of rebuttal or impeachment; (c) rely upon and use as evidence (i) additional documents  
6                   produced by any party, (ii) exhibits included on the exhibit list of any other party, and (iii) any  
7                   pleading, hearing transcript, order, or other document filed with or by the Court in the Chapter  
8                   11 Cases; and/or (d) request that the Court take judicial notice of any pleadings, hearing  
9                   transcripts, orders, or other documents filed in the Chapter 11 Cases, and/or the Securities  
10                  Litigation.

11 Dated: May 25, 2020

Respectfully submitted,

12                   **LOWENSTEIN SANDLER LLP**  
13                   **MICHELSON LAW GROUP**

14                   By: /s/ Randy Michelson  
15                   Randy Michelson (SBN 114095)

16                   *Bankruptcy Counsel to Lead Plaintiff and the Class*

17                   - and -

18                   **LABATON SUCHAROW LLP**

19                   *Lead Counsel to Lead Plaintiff and the Class*

20                   - and -

21                   **WAGSTAFFE, VON LOEWENFELDT, BUSCH**  
22                   **& RADWICK, LLP**

23                   *Liaison Counsel for the Class*

24                   - and -

25                   **ROBBINS GELLER RUDMAN & DOWD LLP**

26                   *Counsel for the Securities Act Plaintiffs*

27                   - and -

28                   **VANOVERBEKE, MICHAUD & TIMMONY,**  
29                   **P.C.**

30                   *Additional Counsel for the Securities Act Plaintiffs*

1  
2  
**EXHIBIT A**  
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70           *Additional Counsel for the Securities Act Plaintiffs*